

# EXHIBIT L

**UNREDACTED VERSION OF  
DOCUMENT SOUGHT TO BE SEALED**

Sent: Thu, 20 Jun 2013 18:55:43 -0700  
Subject: Case 3:16-cv-00236-WHO Document 415-7 Filed 01/04/19 Page 2 of 11  
Fwd: Preview: partial transcript  
From: David Daleiden [REDACTED]  
To: Elizabeth Shearer [REDACTED]

----- Forwarded message -----

From: Ray Ruddy [REDACTED]  
Date: Thu, Jun 20, 2013 at 8:58 AM  
Subject: Re: Preview: partial transcript  
To: David Daleiden [REDACTED] Claude Allen [REDACTED]

Thank you for sending this. It is truly sick!

We have talked and, although we are extremely interested in this topic, we are not going to provide any funds at this time.

We simply do not believe that the environment is right for anything meaningful to come from this project or most other stings. Yes, there would be some great publicity. But would it result in any meaningful legislation? With Obama in the WH and the Democrats controlling the Senate we think not. As Mark Crutcher related Senator Coburn's words: "you won't get any political support as the Democrats are pals with the people who supply the parts and the Republicans are pals with the purchasers of the parts."

We say "at this time" because we remain truly interested in this subject and believe it might be a real game changer at some time. So please keep us abreast of your progress say, once or twice a year, and continue to ask if we are interested.

Claude suggests you contact Phill Kline as he found evidence of a body parts network and was prepared to prosecute. Evidently Phill is quite expert in this subject.

Our best wishes go with you on whatever pro-life activities you commence in the future.

---

From: David Daleiden [REDACTED]  
Date: Wednesday, June 19, 2013 9:05 PM  
To: Ray Ruddy [REDACTED] Claude Allen [REDACTED]  
Subject: Preview: partial transcript

Hi Ray, Claude,  
Please find attached a scanned copy of the modified NDA that Ray signed last week in Newton.

I believe I can share with you, *with the utmost confidentiality*, a partial transcript of a few minutes of video from my field work last week. These are some selections from my conversation (posing as a stem cell researcher) with the procurement manager of a major fetal tissue trafficking company. This is about 3 minutes of a 20 minute conversation, which also includes the company president. I expect to get a lot more footage like this over the next year.

We discusses the problem of trying to get the most intact tissue possible out of a late 2nd-trimester abortion. She says it is "unfortunate" and "pisses me off" that she cannot have the abortion doctors change the abortion procedure from dismemberment to induction (which has a greater risk of live births) in order to get better tissue. She also indicates she has tried to convince the abortion doctors to alter their procedures for her business:

**Procurement Manager:** Because they just aren't [usually intact], **the abdomen is always ripped open.**

[...]

**Procurement Manager:** **Everything will just get ripped up. Whenever we have a smooth portion of liver, we think that's good.**

**Researcher:** Oh, okay.

**Procurement Manager:** Because most of the time it's got, you know, just the instruments they go in to pull.

**Researcher:** Yeah.

**Procurement Manager:** And it's just whatever presents first. And unfortunately, and I don't know why, **a lot of the times the abdomen presents first and they just go in and start pulling**, and--

**Researcher:** Oh so they just go in and pull it out by the abdomen.

**Procurement Manager:** Yeah, they're not trying to--

**Researcher:** They're not trying to--**they don't have my interests in mind!**

**Procurement Manager:** **Or mine. [Laughs] It really pisses me off!**

[...]

**Procurement Manager:** Yeah, but they're just there to end the pregnancy. And so, we cannot ask them to change their process. So.

**Researcher:** Really?

Researcher: Even just to switch to like, induction versus D&E? They can't even do that?

[...]

Procurement Manager: Yeah, they cannot change the abortion procedure to benefit anybody. **Unfortunate.**

[...]

Procurement Manager: **In fact, I have even said to some of the doctors, you know, can't you just put an extra lam in?** [...]

Procurement Manager: He said maybe if she's 15 years old and I can get another one in, because she's had no, the cervix has never opened--

Researcher: So it's important there's some justification in the procedure for it.

Procurement Manager: Exactly. But, I'm not doing it for you, I'm doing it for the patient's well-being.

Researcher: Wow.

Procurement Manager: **So I kinda go, well, okay, sucks to be me, but they can't do that.**

[...]

Researcher: Yeah. Okay, so you just wait for them to bring you the tissue then.

Procurement Manager: Yeah. **We're usually standing right outside the door. They're doing the procedure in the OR and we're in the lab area.**

Bcc: Elizabeth Shearer [REDACTED] Annamarie Bettisworth [REDACTED] Albin Rhomberg [REDACTED]  
Case 3:16-cv-00236-WHO Document 415-7 Filed 01/04/19 Page 4 of 11  
Sent: Tue, 2 Jul 2013 01:05:51 -0700  
Subject: Most pressing financial needs  
From: David Daleiden [REDACTED]  
To: jholman [REDACTED]  
Cc: fred [REDACTED]  
[CMPexpenses.pdf](#)

Hi Jim,  
Good to talk to you today. Thank you, and Fred & Peggy, for working on setting up the meeting later this summer, whenever we can do it.

I've attached a brief breakdown that I told you about over the phone of how the \$10,500 donated to this project to date has been spent. In order for this project to be done with the precision, flexibility, and thoroughness that will allow it to reach its full potential on release, it will of course need to find full funding sooner rather than later.

Ray Ruddy and his assistant Claude Allen are "extremely interested" (their words) and are contributing their practical assistance at the moment, perhaps (but not guaranteed) funding at some point in the near future. Dr. Theresa Stanton Collett and Dr. Janet Smith are both very interested and are trying to connect me with some individuals they know. Of course, this all takes time and can be unpredictable.

I would say that at this point, it costs about \$2000/month for this project to operate in a minimalist fashion--that's not close to what I would consider full capacity, but that's enough to "keep the lights on" as it were and allow different components to keep moving forward.

As for the immediate costs you asked about over the phone, in the short-term, the things I am most immediately concerned about being able to provide for are:

**-Covert Camera equipment for tissue procurement observation: \$800 (~\$300 camera piece, ~\$500 = DVR)**

I currently have one standard covert camera set (camera piece + recorder DVR pack/battery) and a regular digital HD camera set for non-covert filming. The observation of a tissue procurement requires a different camera piece, like we talked about over the phone. It would be good to get another DVR to go with it as well, so that I can have two covert cams running at once (two different field workers) if necessary in future situations (see below).

**-Infiltrator Relocation & Support: \$10,000**

Unfortunately, there is simply no way to bring the field worker who has been offered 2 entry-level jobs at a major fetal tissue company out of CA for a minimal or "barely enough" amount. For her to come out and do this for 1-3 months, we need to be able to *promise* her that her life will be as undisturbed as possible afterward and she can pick up where she left off. That means keeping her old apartment open (and a new one for the time in CA), taking care of all of her moving/travel expenses, and offering enough of a stipend to make it worth her trouble. She makes barely enough to cover her rent right now and still has substantial student loans. I believe that an offer of \$5000 flat stipend would be enough to convince her it will be worth it, and the other \$5000 should be able to cover the costs of two apartments, travel, and moving for the 1 to 3 month infiltration period. The length she can do it for will *largely* depend on how comfortable we can make it for her, as it is an incredibly taxing endeavor.

**-Upcoming conference infiltrations (~\$8000, 4 events = total)**

There are several abortion and stem cell/tissue conferences coming up in the Fall that are a high priority to attend, conduct surveillance, build undercover relationships with key "bad guys" and obtain more footage like the Procurement Manager from my recent trip. One of the conferences is a Planned Parenthood meeting. Registrations are typically in the \$500 range, as are plane flights, and it's best to take two people. The sooner I know we can afford to attend these events, the sooner I can recruit the right individual(s) to go, and the more I can tailor scenarios to get good footage. In truth each of these 4 events is a high priority, and only happens once per year.

**-Investigator Compensation (~\$1000/month)**

I have ongoing expenses at minimum of a little under \$1000/month. I'm starting to do some part-time contract research work on the side for other organizations to pay my own bills and so take pressure off of the fundraising for this project. Of course, this is not an ideal situation because of the way it divides my attention. Also, the most intense, Live-Action-style field work will have to wait until I can compensate actors for their time.

Thanks for believing in this project. I hope to show yo= u the video and documents I already have soon! Together in the fight,

=

-David

**Sent:** Wed, 24 Jul 2013 23:35:48 -0700  
**Subject:** Re: follow up  
**From:** David Daleiden [REDACTED]  
**To:** Joseph Moran [REDACTED]  
**Cc:** Laurel Moran [REDACTED]

Hi Joe, Laurel,

Hope you guys are doing well. I met with Marcella Ketelhut, one of the LLDF directors, over the weekend, along with their legal director Katie Short, and spent a few hours telling them about the project. They're very excited about it and referred me to Dana Cody yesterday. She is on-board and told me that Life Legal would be happy to help out by receiving a donation in order to make a grant to my project.

I'm going to check with my mail carrier tomorrow morning if there is anything new from the IRS about the tax-exempt confirmation for The Center for Medical Progress.

Talk to you soon. Together in the fight!

-David  
[REDACTED]

On Tue, Jul 16, 2013 at 3:20 PM, David Daleiden [REDACTED] wrote:

Hi Joe,  
So sorry it's taken so long for me to get back to you! I was about to send off an email to you today. I really enjoyed getting to meet both of you and talk about my work, I just got swamped right afterward with the preparation for a special interaction with one of the subjects of investigation.

My non-profit is The Center for Medical Progress. Troy Newman from Operation Rescue is on my board (although OR is not a non-profit at the moment). Alliance Defending Freedom (ADF) is working very closely with me on the legal research; Casey Mattox is my contact there. Mark Crutcher (Life Dynamics) and Jennifer Lahl (Center for Bioethics and Culture) have been advising me on some aspects of the project. Jennifer just put me in contact with Dana Cody from LLDF, and she and I will be discussing the project as soon as she takes care of some family things. I'm also going to be discussing the project with Marcella Ketelhut (one of the LLDF board members) this weekend. Sue and Tom Cyr are putting me in touch with Fr. Pavone and Priests for Life; I'm waiting to hear back from him this week.

Please let me know if you have any other questions! I will definitely keep you and Laurel updated. Again, I'm very sorry about the delay.

Talk to you soon,

-David

On Tue, Jul 16, 2013 at 2:52 PM, Joseph Moran [REDACTED] wrote:

Hello David,

It's been almost a week since our lunch meeting at Bennigan's. I have been waiting for the follow up email from you with the name and contact information for your non-profit group (pending IRS approval) that you said that you'd be sending me. I was also wondering if you could provide me with the names of all the other non-profit pro-life groups that you have been somehow consulting/working with in this process? Thanks.

God bless,  
Joe

Message

**From:** Scott Turicchi [REDACTED]  
**Sent:** 9/29/2014 5:32:35 PM  
**To:** David Daleiden [REDACTED]  
**CC:** George Esseff [REDACTED]  
**Subject:** RE: Matching grant

So, the match is solid? I wasn't sure from the last email. If so, I will send the remainder.

Scott

**From:** David Daleiden [REDACTED]  
**Sent:** Monday, September 29, 2014 9:46 AM  
**To:** Scott Turicchi  
**Cc:** George Esseff  
**Subject:** Re: Matching grant

Hi George, Scott,

Just a quick update--wanted to let you know that we are successfully registered for the meeting and transportation is taken care of. Not sure if you already put the rest of the donation in the mail or not, but it would be good to have that before we leave on the trip--literally 10 days from now--so we are prepared for anything while out in the field.

Thanks! St. Michael, pray for us.

-David

On Wed, Sep 17, 2014 at 6:56 PM, David Daleiden <[REDACTED]> wrote:  
Just as a reminder, the conference registration deadline is Friday next week, September 26.

Thanks!

On Tue, Sep 16, 2014 at 1:59 PM, Scott Turicchi <[REDACTED]> wrote:  
Excellent

----- Original message -----

**From:** David Daleiden  
**Date:** 09/16/2014 1:41 PM (GMT-08:00)  
**To:** Scott Turicchi , George Esseff  
**Subject:** Matching grant

Hi Scott, George,

Claude Allen called me this afternoon and said that Ray Ruddy is willing to match your \$20k. He is also trying to bring all the law enforcement and political players together, first in Arizona and then in other states, to make sure my evidence has its full impact.

Thanks! God bless,

-David



This email, its contents and attachments contain information from j2 Global, Inc. and/or its affiliates which may be privileged, confidential or otherwise protected from disclosure. The information is intended to be for the addressee(s) only. If you are not an addressee, any disclosure, copy, distribution, or use of the contents of this message is prohibited. If you have received this email in error please notify the sender by reply e-mail and delete the original message and any copies. © 2013 j2 Global, Inc. All rights reserved. eFax®, eVoice®, Campaigner®, FuseMail®, KeepItSafe® and Onebox® are registered trademarks of j2 Global, Inc. and its affiliates

Message

**From:** Dana Cody [REDACTED]  
**Sent:** 7/26/2013 10:46:02 PM  
**To:** David Daleiden [REDACTED]  
**Subject:** RE: Project Proposal Information

David,

I saw that you called today. Sorry I missed your call. Just wanted to let you know that Katie and I are both in the process of reviewing and discussing the proposal. I will be in touch first part of next week, probably some time Tuesday.

Enjoy your weekend -- Dana

---

**From:** David Daleiden [REDACTED]  
**Sent:** Thursday, July 25, 2013 2:17 AM  
**To:** Dana Cody  
**Cc:** Katie Short; Marcella Ketelhut; jholman [REDACTED]  
**Subject:** Project Proposal Information

Hi Dana, Katie,

Please find attached several confidential documents for Life Legal that describe my project plan, including the original 20-page project proposal as well as two one-page executive summaries. Dana, I am also attaching the two one-page "Mission Summaries" that you requested about the project components that are in need of funding ASAP. I am happy to answer any questions or provide further info as necessary.

All of these documents contain highly sensitive information and so please treat them under the protocols of attorney-client privilege, in order to protect the efficacy of the operations and the security of the individuals involved in them.

Thanks for your help so far! Talk to you soon,

-David  
[REDACTED]

## Message

**From:** Marcella Ketelhut [REDACTED]  
**Sent:** 10/17/2013 5:03:58 AM  
**To:** David Daleiden [REDACTED]  
**Subject:** Re: Draft invitation, Contact List

This looks good. Let's see what he comes up with, and then we'll pick our first three couples. Blessings,  
 Marcella

On Oct 16, 2013, at 8:29 PM, David Daleiden wrote:

> Hi Fr. Dave,  
 >  
 > It was good to see you on Monday. Please find below my first crack at an invite email that I would send to the contacts you are suggesting. I am eager to hear your input on it.  
 >  
 > Marcella and I talked more about the logistics of the event itself, and she suggested that given the heavy subject matter of my presentation it might be better to do multiple small-group meetings of just 3 or so individuals/couples. We are ready to start preparing for the first one so if you can forward the list you were thinking of, that would be great! Please let us know if you have any insight as to 3 good "candidates" for the first run.  
 >  
 > Thanks for your help Fr.! God bless,  
 >  
 > -David  
 >  
 > \*\*\*\*\*  
 >  
 > Dear \_\_\_\_\_,  
 >  
 > My name is David Daleiden, and I lead a small, new pro-life investigative journalism outfit called The Center for Medical Progress. I have nearly 6 years' experience directing investigative research campaigns against the abortion industry, including several years as Research Director for Lila Rose's organization Live Action.  
 >  
 > I am currently working on a long-term, comprehensive expose of a shocking and disturbing phenomenon within the abortion industry that makes the crimes of convicted Dr. Kermit Gosnell look mild by comparison. The evidence we are uncovering implicates Planned Parenthood in state and federal felonies in multiple states, and we are working with a top-level legal team to make sure this evidence will lead to criminal prosecutions of America's biggest abortion business.  
 >  
 > Fr. Dave Heney suggested to me that you might be interested in attending a small gathering we are hosting next month to learn more about the project and secure financial support for our operations. I will be discussing some of our preliminary findings, including documentation and undercover video, and further goals at an evening presentation in Thousand Oaks on \_\_\_\_\_. The event details are as follows:  
 >  
 > 7:00 P.M. \_\_\_\_\_, November XX, 2013  
 >  
 > [REDACTED]  
 >  
 > Please RSVP to myself or Marcella Ketelhut (\*contact info\*). I look forward to meeting you and sharing this initiative with you.  
 >  
 > God bless,  
 >  
 > David Daleiden  
 > The Center for Medical Progress  
 > [REDACTED]